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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KAYLA GAGNON,

Plaintiff,

v.

REVIVE HEALTH SENIOR CARE
MANAGEMENT, LLC, a domestic limited
liability company, doing business as ALTA
SKILLED NURSING AND
REHABILITATION CENTER; and DOES I-
XX inclusive,

Defendant.

Case No. 3:25-cv-00035-ART-CSD

**ORDER GRANTING STIPULATION TO
EXTEND DEFENDANT’S DEADLINE TO
ANSWER OR OTHERWISE RESPOND
TO COMPLAINT**

(Fourth Request)

Defendant Revive Health Senior Care Management, LLC doing business as Alta Skilled Nursing and Rehabilitation Center (“Revive” or “Defendant”) and Plaintiff Kayla Gagnon (“Gagnon” or “Plaintiff”), by and through their respective counsel of record, hereby agree, stipulate and respectfully request that the Court extend the deadline for Defendant to answer or otherwise respond to Plaintiff’s Complaint by seven (7) days, from April 15, 2025 to April 22, 2025.

This is the fourth request to extend this deadline. The parties most recently requested that the Court extend the deadline for Defendant to answer or otherwise respond to Plaintiff’s Complaint from March 14, 2025 to April 15, 2025, which the Court approved on March 14, 2025. ECF No. 18. Since that date, counsel for Plaintiff has confirmed that she represents a second party who will be asserting additional claims against Defendant, and will shortly be filing an Amended Complaint

1 to include this second plaintiff's claims. Counsel for Plaintiff has also provided a formal settlement
2 demand to counsel for Defendant.

3 The parties request a brief extension of seven (7) days for Defendant to answer or otherwise
4 respond to the original Complaint because Plaintiff's counsel is prepared to file the Amended
5 Complaint within that time period. Once Plaintiff's counsel files the Amended Complaint, the
6 responsive pleading deadline for the Amended Complaint will become the operative deadline. The
7 parties intend to explore the possibility of global settlement discussions (including the second
8 plaintiff's claims) immediately following the filing of the Amended Complaint.

9 The undersigned represent that this stipulation is not designed for purposes of delay.

10 Dated: April 15, 2025.

11 McDONALD CARANO LLP

JEPSEN LAW, PLLC

12 By: /s/ Daniel I. Aquino

12 By: /s/ Kendra J. Jepsen

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Attorneys for Defendant

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: April 16, 2025